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Civil Division, Torts Branch
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December 8, 2021

FILED VIA ECF

Honorable Paul A. Crotty
United States District Court
500 Pearl Street
New York, NY 10007

Re: In re: Energetic Tank, Inc.
S.D.N.Y. 1:18-cv-01359 (PAC)

12/8/2021
The requests indicated ✓ are
denied
No relief
Paul A. Crotty
USDC

Dear Judge Crotty:

The United States and Petitioner recently conferred about the sealing of trial exhibits to comply with the terms of the protective orders (ECF Nos. 114, 140) in this matter.

In response to the United States' November 12, 2021, letter motion (ECF No. 342), the Court sealed Exh. 4030 (ECF No. 343). Upon further review by the United States and discussions with counsel for Petitioner, the United States submits it should not have requested sealing of Exh. 4030. Petitioner agrees Exh. 4030 should not be sealed. Accordingly, the United States and Petitioner jointly request the Court unseal Exh. 4030.

In addition, after further review and consultation with the U.S. Navy, the United States requests the Court seal the following trial exhibits in order to conform to the protective orders: Petitioner's Exhs. 82, 124, 125, and 412, and the United States' Exhs. 169 and 276. We have confirmed with Petitioner that it has no objection to the sealing of these exhibits.

With respect to these and previously sealed documents, the Supplemental Protective Order Regarding Confidential Information requires that export documentation be maintained under seal by the Court. (ECF No. 140, ¶ 17). The United States therefore respectfully requests that the documents remain under seal through the closure of the case.

WHEREFORE, the United States and Petitioner jointly request the Court unseal Exh. 4030. In addition, the United States, without objection from Petitioner, requests the Court seal Exhs. 82, 124, 125, 169, 276, and 412. No party will be prejudiced by the relief sought herein.

Respectfully submitted,

/s/ Jessica Sullivan

Jessica Sullivan
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cc: All Counsel per ECF Filing